

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

CENTER FOR BIOLOGICAL  
DIVERSITY,

Plaintiff,

CASE NO. 20-2554-ECT-BRT

v.

SARAH STROMMEN, in her official  
capacity as Commissioner of the Minnesota  
Department of Natural Resources,

**LOCAL RULE 7.1 WORD COUNT  
CERTIFICATE OF COMPLIANCE**

Defendant,

Peter J. Farrell certifies the following:

I am counsel for Defendant Sarah Strommen, in her official capacity as Commissioner of the Minnesota Department of Natural Resources (the DNR), in this matter.

I certify that the reply memorandum complies with the limits in LR 7.1(f) and with the type-size limit of LR 7.1(h). The reply memorandum contains 3,734 words, as counted by Microsoft Word for Office 365, including all text. In addition, the combined word count of the supporting memorandum and the reply memorandum is 9,594 words, which complies with the combined limit of 12,000 words in LR 7.1(f)(1)(B).

Dated: May 25, 2021

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ Pete Farrell

PETER J. FARRELL

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her official capacity as the Commissioner of  
the Minnesota Department of Natural  
Resources*